



Clean River ♦ Healthy Community

June 13, 2016

Diane Butorac  
Regional Planner  
Southwest Regional Office  
Washington Department of Ecology

Dear Diane,

I am making the following comments on behalf of the Spokane Riverkeeper. The Riverkeeper program works for a fishable and swimmable Spokane River and endeavours to protect it from those forces that threaten its health and the well-being. The Spokane River is the heart and soul of our city and a healthy river is essential for a healthy community.

The Spokane Riverkeeper believes that the construction of the Millennium Bulk Coal Export Terminal will have several major impacts on our river and our community. The Draft Environmental Impact Statement (DEIS) addresses some of the potential impacts, but does not take seriously other impacts that this facility would have on our communities and the Spokane River. As such, the Spokane Riverkeeper opposes construction of the Millennium Bulk Coal Export Terminal, and urges the Washington Department of Ecology and Cowlitz County to take the “no action alternative.”

➤ **Coal dust has a destructive impact on communities and infrastructure**

The proposed railroad could eventually carry 16 coal trains per day. The DEIS identifies that “Day to day rail operations could release contaminants into water resources immediately adjacent to the rail line, resulting in the potential for water quality impairment from increased rail operation.” (S-24), but the DEIS fails to take these impacts seriously. Much of this coal would ultimately travel on through Spokane to terminals across the Spokane River and over hangman Creek, on to the West Coast. BNSF studies have shown that each coal car loses as much as 500 lbs of raw coal from uncovered cars each trip. These cars travel adjacent to our river and two tributaries to our river. Spokane Riverkeeper volunteers have found coal in the creeks and along the banks of these rivers from the train traffic carrying loads of coal. This dust is laden with heavy metals and is toxic to humans and to aquatic ecosystems. The construction of the railroad will discharge more coal and coal dust into our waterways and into our urban neighbourhoods. Additionally, coal dust has been shown to have a negative impact on rail

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infrastructure in that the dust is corrosive and weakens rail lines. Spokane is the site of accelerated volatile crude oil-by-rail traffic, and weakened rails increase the odds of a catastrophic rail accident and consequent oil spill and or fire in our community or in our river.

➤ **The global combustion of coal is depriving our river and community of water**

The DEIS states that the proposed Millennium Bulk Terminals will in the emission of 27 million tons of CO<sub>2</sub> per year running at full capacity. This could increase the Greenhouse gas footprint of Washington State almost 30%. The combustion of coal across the earth has been shown to have extreme effects on the Pacific Northwest climate by emitting greenhouse gasses. The impacts of this combustion on the Spokane River cannot be denied nor understated. Nor can these impacts be mitigated. The development of the proposed Millennium Bulk Coal Export Terminal will only exacerbate the effects of climate change that are already accelerating. In 2015, the snow pack in the mountains that feed our river was at an all-time low, an impact felt by extremely warm waters off in the Pacific Ocean. The winter of 2016 saw normal snow packs, but such high temperatures that the snow melted far earlier than normal annual averages. At this moment, our river is running at 3220 cubic feet per second (CFS). The annual mean flow for this time of year is it 11,800 CFS making our current flow near 25% of normal at the front end of the dry season. These low flows and correlated low snowpack are indisputably the result of a new emerging climate regime. Projections by the prestigious University of Washington Climate Impacts Group projects the complete loss of the snowpack that feeds our river by 2080 if we do not reduce carbon emissions. They follow the predictions and modelling of multiple scientific efforts to understand climate change. In light of this unfolding climate change, expanding the capacity or coal fired energy in Asia is to actively destroy our river. Our citizens and our businesses are being deprived of a community asset that has been the foundation our culture, economics and history since its founding.

➤ **The global combustion of coal is poisoning our water and our fish with methyl mercury**

The combustion of coal in Asia has been shown contribute toxic, methyl mercury into Pacific Northwest waterways. Asia emits over 1500 tons of mercury a year and much of that is returned to our waters due to atmospheric transport. According to sources at the National Oceanic and Atmospheric Administration, mercury and other airborne contaminants collect over China during the winter and spring until Siberian winds arrive bearing dust from expanding Chinese and Mongolian deserts. Every five or six days, the winds flush out eastern China, sending dust and industrial pollutants such as ozone precursors high over the Pacific and on to our rivers where it bio-accumulates in virtually all of our fish species. We in Washington State and Spokane, currently have mercury related fish advisories (Department of Health) for all of our species of fish. No one can eat fish without worrying about the effects of methyl mercury.

➤ **Project impacts on public health and quality of life**

The DEIS is silent on the air quality problems created in the Spokane Valley by an additional 16 coal trains per day. As stated above, Union Pacific and BNSF rail lines travel through the heart of our downtown corridor in Spokane as they do in the towns of Millwood and Spokane Valley. These trains deliver large amounts of diesel exhaust. In the winter months our valley suffers severe air quality problems due to its temperature inversions. These inversions trap air pollution and particulates and leave our community exposed for weeks. According to the Spokane Regional Clean Air Authority (SRCAA), Diesel particulate pollution is responsible for numerous public health issues in our community. (SRCAA Fact Sheet: <https://goo.gl/OApXP3> )

SRCAA Fact Sheet Excerpt:

***“What is the concern with diesel pollution?”***

*Diesel exhaust is made up on tiny, highly toxic particles that penetrate our lungs and remain there indefinitely to create and/or worsen both heart and lung conditions. Exposure to diesel particles is linked to immediate and long-term health effects, including:*

- *irritation of the eyes, nose and throat*
- *coughing, laboured breathing, chest tightness and wheezing*
- *making healthy children and adults more susceptible to developing respiratory conditions*
- *increased risk of heart attack or stroke for those with pre-existing heart disease or circulatory problems*
- *lung cancer”*

According to the SRCAA, diesel exhaust is currently responsible for 12% of the particulate pollution in the Spokane Valley. If oil train traffic increases by 9 loaded and unloaded trains per week, our city is going to feel the impacts of this traffic with increasing public health problems and increasing problems with air quality. This is clearly an impact to our community that should be addressed in the DEIS.

Additional issues resulting from the proposed Millennium Bulk Terminals Projects include traffic problems for the public, for emergency first responders, school busses, commercial trucking traffic, commuters and others.

The DEIS currently call out the following potential issues and impacts:

***Rail Traffic Impacts:***

- *“Trains related to the Proposed Action could affect accessibility to community resources and public services during peak travel times because of increasing wait times at grade*

*crossings along the Reynolds Lead, BNSF Spur, and BNSF main rail line.” Summary at S-12.*

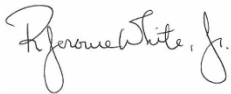
- *“Trains related to the Proposed Action would also increase emergency vehicle delay at rail crossings. The total gate downtime would increase over 130 minutes a day at crossings along the Reynolds Lead and BNSF Spur, and up to 20 minutes a day at the study crossings along the BNSF main line.” Summary at S-32.*
- *Table 6-6 shows every segment on the rail system greatly over capacity if all proposed projects, including coal and oil, are built.*
- *Table 6-7 shows a significant increase in train accidents (this analysis includes oil trains).*
- *Table 6-9 shows unacceptable level of service at multiple rail crossings due to delays from cumulative projects.*

Rail traffic already causes traffic to idle for hundreds of hours a month. There are over 75 road and rail intersections in the Spokane Valley. Long waits due to rail obstruction is a regular occurrence for those who live and work in the Spokane Valley. The City of Spokane Valley has studied the Barker Road crossing and calculated there are 23,100 hours of vehicle delay annually on that one intersection alone. This translates to 232 tons of air pollution a year from idling cars. The proposed Millennium Bulk Coal Terminal Projects would increase rail traffic by another 16 trains per week and therefore pose direct and negative impacts on the people of our community. The Draft Environmental Impact Statement does not address these impacts.

The construction of the Millennium Bulk Coal Terminal facility will have lasting negative impacts on our world, our local community and our Spokane River. The costs of this rail road project in terms of environmental impacts far outweigh any short term benefits. We urge the WDOE and Cowlitz County to take the “no action alternative”.

Thanks for the opportunity to comment.

Respectfully,



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Spokane Riverkeeper

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